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9-15-2015

September 15, 2015

Ms. Jan Palumbo (AWT-150)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

Received  
SEP 18 2015  
Office of Air, Waste & Toxics

**Subject: August/September 2015 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the August 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from July 15, 2014, to September 14, 2015.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The recirculation trench was rehabilitated in late July 2015. A summary of the work was provided via email on August 8, 2015. The work consisted of installing 10 borings to approximately 20 feet below ground surface and backfilling the borings with 1-3-inch crushed concrete or limestone and basalt rock. The existing trench did not have evidence of biofouling, but there was a layer of fines that had accumulated at the base of the trench that was preventing infiltration.
- Start-up consisted of restarting wells EW-1, EW-2, EW4 and EW-5 at approximately 50 gpm for 32 hours. During that test, water levels in the trench showed that no water was accumulating in the trench. Between the end of July and the first week in September, the total flow rate was adjusted to 20 gpm.
- On August 1st, 2015, GSI installed three iSOC infusion units within monitoring wells MW-39, MW-40, and MW-41. iSOC units were deployed to near the bottom of each respective well (approximately 75-78 ft bgs) and were connected to individual oxygen tanks stored within each well vault. The vaults are flush mounted, traffic rated, and secured with a lock.

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- A Site visit was conducted during the first week in September to replace the oxygen cylinders for the iSOCs and to check on the recirculation system. The iSOC wells were in good condition upon inspection. The units appear to be working, as all wells had 42 mg/L or greater concentrations of dissolved oxygen. There was no apparent biofouling on the iSOC units during this visit. Replaced all of the oxygen tanks and redeployed the iSOC units to the same depths.
- During the same visit in early September, the extraction wells and recirculation trench were also checked. It turned out to be good timing for the site visit because Arlington got hit with a big storm the weekend prior to the visit that knocked out power to the facility. Pump tests were run for the primary wells with the following observations:
  - Wells EW-04 and EW-05 were faulted upon arrival. After returning both operation, EW-05 immediately faults. EW-04 continues to run.
  - There was no accumulated water in the infiltration trench central standpipe (M-2).
  - EW-05 well vault has been damaged and could not be opened.
  - The system was left at a total flow rate of ~30gpm. EW-01 at 6.2 gpm, EW-02 at 8.3 gpm, and EW-04 at 14.8 gpm.
- The CMS was revised (Version 4) to incorporate the results of the oxidation bench scale study. EPA informed the Baxter team that Battelle had been contracted to review the data from the site and provide corrective measure recommendations to EPA. EPA requested that the Baxter team place the CMS on hold until the Battelle report is completed and EPA and Baxter teams have met to discuss the ramifications of the Battelle recommendations.

## ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period. Extraction well EW-5 will be evaluated to determine what is required to bring it back into production.
- Baxter will conduct the comprehensive sampling round during the week of September 14-18, 2015.
- EPA will provide the Baxter team with the Battelle report and set up a technical meeting to discuss the path forward.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- No testing was conducted in the past month.



## CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: April 8, 2015

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group

